

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FOX VALLEY & VICINITY CONSTRUCTION	)	
WORKERS WELFARE FUND, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
vs.	)	
	)	NO. 21 C 4098
OZOH ENGINEERING & CONSTRUCTION,	)	
LLC, an Illinois limited liability company,	)	JUDGE EDMOND E. CHANG
	)	
NNAMDI E. OZOH, an individual,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on September 30, 2021 [Dkt. 12], request this Court enter judgment against Defendants, OZOH ENGINEERING & CONSTRUCTION, LLC, an Illinois limited liability company, and NNAMDI E. OZOH, an individual, pursuant to F.R.Civ.P. Rule 55(b). In support of this Motion, Plaintiffs state:

1. On September 30, 2021, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of Defendant Ozoh Engineering & Construction, LLC's payroll books and records for the time period January 1, 2018 forward. The Court also entered an order that judgment would be entered after the completion of the audit.

2. On or about December 21, 2021, Plaintiffs' auditors completed the audit. The audit findings show that the Defendants are delinquent in contributions to the Funds in the amount of

\$7,713.93, plus \$771.39 for liquidated damages and \$2,197.68 for interest. (See Affidavit of David A. Dorfman).

3. Plaintiffs' auditing firm of Calibre CPA Group, PLLC charged Plaintiffs \$1,573.82 to perform the audit examination and complete the report and the Funds are entitled to recover said fees under their Trust Agreements (Dorfman Aff. Par. 7).

4. In addition, Plaintiffs' firm has expended \$502.00 for costs and \$3,202.75 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$15,989.25.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$15,989.25.

/s/ Catherine M. Chapman

Catherine M. Chapman  
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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 14th day of January 2022:

Mr. Nnamdi E. Ozoh, Registered Agent  
Ozoh Engineering & Construction, LLC  
6 Carrington Court  
Hazel Crest, IL 60429-2517

Mr. Nnamdi E. Ozoh  
6 Carrington Court  
Hazel Crest, IL 60429-2517

/s/ Catherine M. Chapman \_\_\_\_\_

Catherine M. Chapman  
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